REMARKS/ARGUMENTS

Upon entry of this amendment, which amends claims 1, 5, and 14, and adds new claims 19-21, claims 1-21 will be pending. In the office action, claims 1-4 were rejected under 35 U.S.C. §102(b) as being anticipated by Fujimoto et al (U.S. Patent No. 6,385,681, hereinafter "Fujimoto"); claims 1-4, 14 and 18 were rejected under 35 U.S.C. §102(b) as being anticipated by Matsunami et al (U.S. Patent Application Publication No. 2002/0095549, hereinafter "Matsunami"); claims 5-13 were objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims; and claims 15-17 were considered allowable over the prior art of record. Applicants request reconsideration of the claims in view of the amendments above and remarks below.

Applicants thank the Examiner for the indication of allowable subject matter. In response, applicants have amended claim 5 to include the elements of claim 1. Thus, applicants submit claims 5-13 are now allowable. Applicants also thank the Examiner for the indication of allowable subject matter for claims 15-17.

Claim 1 was rejected under 35 U.S.C. §102(b) as being anticipated by Fujimoto. Applicants respectfully submit that Fujimoto does not disclose or suggest every element of claim 1, as amended. For example, Fujimoto does not disclose or suggest that the device control unit is configured to select a routing path out of possible routing paths through the interconnect routing unit from the device control unit to the device interface unit upon receiving a command from a host to create a connection between the host and a storage device to allow processing of the command, which is an element of a serial I/O structure. The rejection states that device interface units are shown as reference number 130 in Fig. 1. Applicants cannot find the reference number 130 in Fig. 1. However, the rejection may be referring to disk IF unit 12. The rejection states the host interface units are referred to as 102 in Fig. 1 of Fujimoto. As shown in Fig. 1, host interface units 102 and disk IF unit 12 are not connected together. Thus, the host interface units do not select a routing path from the device control unit to the device interface unit.

Also, Fujimoto does not disclose or suggest processing of a command that is an element of a serial input/output structure. The examiner has not specified where in Fujimoto a

serial I/O structure is disclosed or suggested. However, nowhere in Fujimoto is a serial I/O structure disclosed or suggested. In fact, a search of Fujimoto for the word "serial" does not yield any matches. Further, the examiner might allege that fibre channels are used to transmit data in a serial bit format; however, the examiner has not shown that the commands processed are an element of a serial I/O structure in Fujimoto. A possible definition of a serial I/O structure is disclosed on page 7 of the specification and states a serial I/O structure comprises a command to a storage device, some or no data transfer, and a completion status from the storage device.

Claim 1 was also rejected under 35 U.S.C. §102(b) as being anticipated by Matsunami. Applicants submit that Matsunami does not disclose or suggest every element of claim 1, as amended. The rejection states that the device control unit is switching controller 2022 in Fig. 5. This is a device that is found in host interface node 203. The device interface units are described as host interface nodes 202. Switching control 2022 stores a frame and checks it for errors. However, Matsunami discloses that SWP2010 establishes a path whenever an S Packet 60 is received and releases that path when transfer of the S Packet 60 is finished. SWP 2010 is part of crossbar switch 2001, which receives the S Packet 60. SWP2010 refers to the expansion header 601 of the S Packet to establish a path for carrying out switch control for the SWP. *See Matsunami*, par. 63. Accordingly, SWP2010 determines how to switch the S Packet through crossbar switch 201 upon receiving the S Packet. Thus, the element referred to as the device control unit, switching controller 2022, does not select a routing path from the device control unit to the device interface unit in Matsunami. Rather, crossbar switch 201 determines how to switch the packet upon receiving the packet.

Also, Matsunami does not disclose or suggest that the commands are an element of a serial I/O structure. Matsunami may disclose a fibre channel but applicants submit this does not disclose or suggest that the commands are an element of a serial I/O structure.

Accordingly, applicants respectfully request withdrawal of the rejection of claim 1. Claims 2-4 and 19-21 depend from claim 1 and thus derive patentability at least therefrom. These claims also recite additional non-obvious and novel features. For example, claim 19 recites that the device control unit selects a read routing path from the host to the storage device through the interconnect routing unit and a write routing path from the storage device to the host through the interconnect routing unit. Applicants submit that the cited references do not disclose

or suggest that the device control unit selects both a read routing path and a write routing path. The write path is from the storage device to the device control unit through the interconnect routing unit. In claim 19, the write path is selected by the device control unit and not the device interface unit associated with the storage devices.

Further, claim 20 recites that the device control unit comprises a read select routing unit configured to select a read routing path and a write select routing unit configured to select a write routing path.

Claim 21 also recites that each device control unit includes a single read select unit and a single write select unit for a single host. The single write select unit is associated with the host. By having a single write select unit for a single host in claim 21, having a write select unit for each storage device is not needed and thus simplifies the system.

Applicant respectfully submits that the present claims are in condition for allowance and an early Notice of Allowance is earnestly sought. The undersigned may be contacted at the telephone number below at the Examiner's convenience if it would help in the prosecution of this matter.

Respectfully submitted,

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